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7	IN THE UNITED STATES DISTRICT COURT							
8	FOR THE DISTRICT OF ARIZONA							
9	IN RE BARI	D IVC FILTERS PRODUCTS	No. 2:15-MD-02641-DGC					
10	LIABILITY	LITIGATION	SECOND AMENDED MASTER SHORT FORM COMPLAINT FOR					
11 12	15	. 9	DAMAGES FOR INDIVIDUAL CLAIMS AND DEMAND FOR JURY TRIAL					
13			IKIAL					
14	Plaintiff(s) named below, for their Complaint against Defendants named below,							
15	incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc. 364)							
1617								
and a	1.	Patti Schandelmeier Patricia Sc	handelmeier					
18 19	2.	Spousal Plaintiff/Deceased Pa	rty's spouse or other party making loss of					
20		consortium claim:						
21		N/A	49/8/50					
22	3.	Other Plaintiff and capacity	(i.e., administrator, executor, guardian,					
23		conservator):						
24		N/A						
25	4.	Plaintiff's/Deceased Party's sta	nte(s) [if more than one Plaintiff] of residence					
26								
27		Florida						
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1	5.	Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence				
2		at the time of injury:				
3		Florida				
4	6.	Plaintiff's current state(s) [if more than one Plaintiff] of residence:				
5		Florida				
6	7.	District Court and Division in which venue would be proper absent direct				
7		filing:				
8		Florida Middle District Court, Fort Myers				
9	8.	Defendants (check Defendants against whom Complaint is made):				
10		C. R. Bard Inc.				
11		Bard Peripheral Vascular, Inc.				
12	9.	Basis of Jurisdiction:				
13		✓ Diversity of Citizenship				
14		Other: MDL 2641 Centralization				
15		a. Other allegations of jurisdiction and venue not expressed in Master				
16		Complaint:				
17						
18						
19						
20	10.	Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making				
21		a claim (Check applicable Inferior Vena Cava Filter(s)):				
22		□ Recovery [®] Vena Cava Filter				
23		□ G2 [®] Vena Cava Filter				
24		☐ G2 [®] Express Vena Cava Filter				
25		□ G2 [®] X Vena Cava Filter				
26		□ Eclipse [®] Vena Cava Filter				
27		✓ Meridian [®] Vena Cava Filter				
28						
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1			Denali® Vena	a Cava Filter
2			Other:	
3	11.	Date of Implantation as to each product:		
4		10/29/20	012	1 0 0 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0
5				
6	12.	Count	s in the Maste	r Complaint brought by Plaintiff(s):
7		\mathbf{M}	Count I:	Strict Products Liability - Manufacturing Defect
8		M	Count II:	Strict Products Liability - Information Defect (Failure
9				to Warn)
10		$ \mathbf{d} $	Count III:	Strict Products Liability - Design Defect
11	25	\mathbf{d}	Count IV:	Negligence - Design
12		ď	Count V:	Negligence - Manufacture
13		\mathbf{d}	Count VI:	Negligence – Failure to Recall/Retrofit
14			Count VII:	Negligence - Failure to Warn
15		\checkmark	Count VIII:	Negligent Misrepresentation
16		\blacksquare	Count IX:	Negligence Per Se
17		$ \mathbf{M} $	Count X:	Breach of Express Warranty
18		$ \mathbf{d}$	Count XI:	Breach of Implied Warranty
19			Count XII:	Fraudulent Misrepresentation
20		\checkmark	Count XIII:	Fraudulent Concealment
21		ď	Count XIV:	Violations of Applicable Florida (insert
22				state) Law Prohibiting Consumer Fraud and Unfair and
23				Deceptive Trade Practices
24	-		Count XV:	Loss of Consortium
25			Count XVI:	Wrongful Death
26			Count XVII:	Survival
27		M	Punitive Dan	nages
28	::			*

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1 2	Other(s): All claims for Relief set forth in the Master Complaint for an amount to be determined by the trier of fact including for the following: (please state the facts supporting this Count in the space immediately below):						
3							
4	Plaintiff suffers from IVC filter perforation, migration, and tilt. The						
5	filter struts are perforating the inferior vena cava wall with one strut						
6	abutting a branch of the inferior mesenteric artery.						
7							
8							
9	13. Jury Trial demanded for all issues so triable?						
10	▼ Yes						
11	□ No						
12	RESPECTFULLY SUBMITTED this 13th day of February, 2019.						
13	JOHNSON LAW GROUP						
14							
15	By: /s/ Clint Reed TX Bar No. 24084674 2925 Richmond Ave., Suite 1700 Houston, Texas 77098 Tel: 713-626-9336						
16							
17							
18	Fax: 713-626-3394						
19	I hereby certify that on this 13th day of February, 2019, I electronically						
20	transmitted the attached document to the Clerk's Office using the CM/ECF System for						
21							
22	filing and transmittal of a Notice of Electronic Filing.						
23	/s/ Clint Reed						
24							
25							
26							
27							
28							
3							
	II						